

EXHIBIT A

STATE OF GEORGIA

Defendants.

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) **Civil Action No.**
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) **COMPLAINT FOR DAMAGES**
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Plaintiff's spouse, Milton Mitchell, Jr. was killed in an automobile collision on 5 April 2002.

4.

At the time of his death, decedent Milton Mitchell, Jr. had a life insurance policy in effect with Defendant Reliance Standard Life Insurance Company. Plaintiff Belinda Mitchell was his designated beneficiary.

5.

Decedent's spouse, Plaintiff Belinda Mitchell, filled out and signed the required paperwork within the allotted time.

6.

Plaintiff Mitchell complied with and provided all of the necessary requirements and forms needed for Defendant Reliance Standard Life Insurance Company to process the claim, yet payment has not been issued.

7.

Defendant Reliance Standard Life Insurance Company are in breach of contract by violating the terms of the agreed-upon terms and conditions of the binding contract they entered into with plaintiff's spouse, decedent Milton Mitchell, Jr.

WHEREFORE, Plaintiff demands:

(a) That summons be issued requiring the defendant to be served as provided by law and requiring the defendant to answer the Complaint;

- (b) That Plaintiff have a trial by a fair and impartial jury of twelve members;
- (c) That Plaintiff obtains a judgment for damages against the defendants in a sufficient amount to compensate her for her injuries and damages;
- (d) That the costs of bringing this action be assessed against the Defendant; and
- (e) That Plaintiff has such other and further relief as this Court shall deem just and equitable.

/s/ Paul R. Ayerbe
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